

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TIFFANY AARON, EBONI HORN-
WATSON, STACEY BLANCHETTE,
STEPHANIE REYNOLDS, SANDRA
BOUDREAUX, CYNTHIA CLARK,
ESTELLE FOSTER, SUSAN HEBERT,
AND CAROLYN HOLMAN,

Plaintiffs

V.

JASON LEDAY, LTHM HOUSTON -
OPERATIONS, LLC, AND
KIGLAPAIT HOSPITAL
CORPORATION d/b/a RENAISSANCE
HOSPITAL GROVES

Defendants.

CIVIL ACTION NO. 13-cv-1716

JOINT MOTION FOR ENTRY OF AGREED FINAL JUDGMENT

Plaintiffs have alleged claims under the Fair Labor Standards Act, the WARN Act, breach of contract, and COBRA violation under 29 U.S.C. § 1132(c)(1). LTHM Houston – Operations, LLC has filed for bankruptcy, and there is a bona fide dispute as to the extent of liability with respect to Defendants Jason LeDay and Kiglapait Hospital Corporation. In order to avoid the time, expense, and risks of trial, the parties have agreed to enter into a final judgment, attached as Exhibit #1 to this Motion.

Wherefore, the parties respectfully request that the Court enter a final judgment in the form attached to this Motion.

Dated: January 29, 2015

SUD LAW P.C.

/s/ Nitin Sud

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/s/ Troy Tindal on Jan 29, 2015

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